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9 *Attorneys for Plaintiff*

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA  
12 WESTER DIVISION

13 JOHN DRINKWATER,

14 Plaintiff,

15 v.

16 TRADER JOE'S COMPANY, AND  
17 DOES 1-10,

18 Defendants.

Case No. 2:25-cv-02617-FLA-ADS

**DECLARATION OF DYLAN  
GRIMES IN SUPPORT OF  
PLAINTIFF'S RESPONSE TO  
ORDER TO SHOW CAUSE WHY  
THE COURT SHOULD EXERCISE  
SUPPLEMENTAL JURISDICTION  
OVER THE STATE LAW CLAIM**

The Honorable Fernando L.  
Aenlle-Rocha

Complaint Filed: March 25, 2025

Discovery Cutoff: Not Set

Pretrial-Conference: Not Set

Trial Date: Not Set

## DECLARATION OF DYLAN GRIMES

I, Dylan Grimes, declare:

1. I am an attorney licensed to practice law in the State of California and admitted to practice in this Court. I am a partner at Grime Law, LLP, the attorneys of record for Plaintiff. I make this declaration based on my personal knowledge and/or my review of my firm's files generated and maintained in the course of this case and could competently testify to these matters.

2. I submit this declaration in support of Plaintiff's Response to this Court's Order to Show Cause, ECF No. 12.

3. Neither Grime Law nor Plaintiff are a high-frequency litigants within the definition under state law. Cal. Civ. Code § 425.55(b). Plaintiff has not filed "10 or more complaints alleging a construction-related accessibility violation within the 12-month period immediately preceding the filing of the current complaint alleging a construction-related accessibility violation."

4. Plaintiff does not bring a construction-related accessibility violation, nor to my knowledge has he brought a claim related to a construction-related accessibility violation claim in California in the last 12 months.

5. Grime Law, LLP has not represented as attorney of record any high-frequency litigant plaintiffs in actions that were resolved within the 12-month period immediately preceding the filing of the current complaint alleging a construction-related accessibility violation.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 22nd day of April, 2025, at Los Angeles, California.



DYLAN GRIMES